

ALEX G. TSE (CABN 152348)
United States Attorney

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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 18-179 EMC
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED]
v.)	ORDER CONTINUING MATTER AND
)	EXCLUDING TIME UNDER THE
CHRISHAWN BEAL ET AL.,)	SPEEDY TRIAL ACT
)	
Defendants.)	Date: August 7, 2018, to September 5, 2018
)	
)	

The parties appeared before the Honorable Edward M. Chen on August 7, 2018, for a status conference. The government represented that to date it has produced more than 100 pages of discovery, photographs, body worn camera footage, and additional discovery to the defendants. The government also represented that it would be producing additional body worn camera footage and that it would seek a protective order to cover some of the body worn camera footage because the footage contains witness statements. The defense represented that would need time to review and analyze discovery. Accordingly, the parties requested, and the Court granted, a continuance until September 5, 2018, for further status. Further, the Court designated the case as complex. The parties also stipulated, and the Court ordered, that time between August 7, 2018, and September 5, 2018, be excluded for effective preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii) & (iv).

1 The parties further stipulate, and ask the Court to find, that the requested continuance and
2 exclusion of time are in the interests of justice and outweigh the best interest of the public and the
3 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

4
5 SO STIPULATED.

6 DATED: August 9, 2018

ALEX G. TSE
United States Attorney

7
8 /s/
CHRISTIAAN H. HIGHSMITH
Assistant United States Attorney

9
10 DATED: August 9, 2018

11 /s/
MARTIN SABELLI
Counsel for Defendant Chrishawn Beal

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13 /s/
DENA MARIE YOUNG
Counsel for Defendant Jaray Day-Shawn Simmons

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15 /s/
ADAM PENNELLA
Counsel for Defendant Ledarrell Javon Crockett

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17 /s/
KENNETH WINE
Counsel for Defendant Melvin Lamont Corbin

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19 /s/
ROBERT WAGGENER
Counsel for Defendant Nakia Jones

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21 /s/
SARA ELLEN RIEF
Counsel for Defendant Siddiq Jafar Abdullah

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23 /s/
MICHAEL STEPANIAN
Counsel for Defendant Romello Shamar Jones

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25 /s/
EDWARD SWANSON
Counsel for Defendant Jade Lafay Johnson

1
2 **[~~PROPOSED~~] ORDER**

3 For the reasons stated, this matter is continued until September 5, 2018 at 1:45 p.m. for a status
4 conference. The time between August 7, 2018, and September 5, 2018, is excluded from the running of
5 the speedy trial clock for effective preparation of counsel under 18 U.S.C. § 3161(h)(7)(B)(ii) & (iv).
6 Failure to grant the continuance would deny the defendant's counsel the reasonable time necessary to
7 prepare, taking into account the exercise of due diligence.

8
9 IT IS SO ORDERED.

10 DATED: 8/9/18 _____

